# **EXHIBIT A**

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a Delaware corporation,

Plaintiff,

٧.

FAIRCHILD SEMICONDUCTOR INTERNATIONAL, INC., a Delaware corporation, and FAIRCHILD SEMICONDUCTOR CORPORATION, a Delaware corporation,

Defendants.

C.A. No. 04-1371-JJF

## POWER INTEGRATIONS, INC.'S RESPONSES TO DEFENDANTS' FIRST SET OF REQUESTS FOR ADMISSION (NOS. 1-25)

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Power Integrations, Inc. ("Power Integrations") hereby responds and objects to Defendants Fairchild Semiconductor International, Inc. and Fairchild Semiconductor Corporation's (collectively "Fairchild") First Set of Requests for Admission (Nos. 1-25) served as follows. The responses and objections are made according to the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Delaware and are based upon information presently available to Power Integrations. These objections and responses are without prejudice to Power Integrations' right to use or rely on subsequently discovered information.

#### **GENERAL OBJECTIONS**

1. Power Integrations objects to the Requests to the extent that they seek information or documents protected by attorney-client privilege and/or the work product doctrine, information or documents prepared in anticipation of litigation or for trial, not

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relevant to the subject matter of this investigation, or not reasonably calculated to lead to the discovery of admissible evidence.

- 2. Power Integrations objects to the Requests to the extent that they use terms or phrases that are not defined or understood; Power Integrations will not speculate as to the meaning ascribed to these terms or phrases.
- 3. Power Integrations objects to these Requests to the extent that they are premature since Fairchild has not yet provided complete discovery in response to Power Integrations' first set of discovery requests. Power Integrations' investigation is ongoing and it reserves the right to amend and supplement its responses to these Requests as appropriate.
- 4. Power Integrations objects to the Requests to the extent they call for a legal opinion or conclusion.
- 5. Power Integrations objects to the Definitions, Instructions, and Requests to the extent that they seek information or the identification of documents not within Power Integrations' possession, custody or control, or refer to persons, entities, or events not known to Power Integrations, on the grounds that such Definitions, Instructions, and Requests: (i) seek to require more of Power Integrations than any obligation imposed by law; (ii) subject Power Integrations to unreasonable and undue burden and expense, or (iii) seek to impose upon Power Integrations an obligation to investigate or discover information or materials from third parties or sources which are equally accessible to Fairchild.
- 6. Power Integrations objects to the Requests to the extent that they are premature and request that Power Integrations set forth its contention discovery and expert opinions. Power Integrations' investigation is ongoing and it will provide such discovery in accordance with the procedural schedule the Court sets forth in this case.
- 7. Power Integrations objects to each and every Request to the extent that it: (i) is framed in terms that Fairchild has not specifically defined; or (ii) fails to identify with

reasonable particularity the information requested. Power Integrations further objects to such Requests on the grounds that they are vague, ambiguous and unduly broad.

- 8. Power Integrations reserves the right to make any use of, or to introduce at any hearing and at trial, information and/or documents responsive to the Requests but discovered subsequent to the date of its response, including, but not limited to, any such information or documents obtained in discovery herein.
- 9. Power Integrations incorporates by reference the General Objections set forth above into the specific objections and responses set forth below. Power Integrations may repeat a general objection for emphasis or some other reason. The failure to repeat any general objection does not waive any general objection to the interrogatory. Moreover, Power Integrations does not waive its right to amend its objections.

#### RESPONSES TO REQUESTS FOR ADMISSION

#### **REQUEST FOR ADMISSION NO. 1:**

Admit that prior to October 20, 2004, Power Integrations made, sold, or offered for sale within or imported into the United States products that practice or embody at least one claim of U.S. Patent No. 4,811,075.

#### **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

Subject to and without waiving its General Objections, Power Integrations responds as follows: Admitted.

#### REQUEST FOR ADMISSION NO. 2:

Admit that Power Integrations did not fix the number of U.S. Patent No. 4,811,075 on any product prior to October 20, 2004.

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## RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Power Integrations objects to the words "fix" and "on any product" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at <a href="https://www.powerint.com">www.powerint.com</a>.

At that same time, Power Integrations included a notice on its website

(www.powerint.com) that provided a link to a listing of Power Integrations' patents.

Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 4,881,075. On the basis of these facts, Power Integrations denies this request.

## **REQUEST FOR ADMISSION NO. 3:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 4,811,075 on any package prior to October 20, 2004.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

Power Integrations objects to the words "fix" and "on any package" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at <a href="https://www.powerint.com">www.powerint.com</a>.

At that same time, Power Integrations included a notice on its website

(www.powerint.com) that provided a link to a listing of Power Integrations' patents.

Currently, the website states the following:

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Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 4,881,075. On the basis of these facts, Power Integrations denies this request.

## **REQUEST FOR ADMISSION NO. 4:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 4,811,075 on any label prior to October 20, 2004.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

Power Integrations objects to the words "fix" and "on any label" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at www.powerint.com.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 4,881,075. On the basis of these facts, Power Integrations denies this request.

## **REQUEST FOR ADMISSION NO. 5:**

Admit that Power Integrations did not mark any product with U.S. Patent No. 4,811,075 pursuant to 35 U.S.C. § 287(a) prior to October 20, 2004.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

Power Integrations objects to the words "mark any product" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at <a href="https://www.powerint.com">www.powerint.com</a>.

At that same time, Power Integrations included a notice on its website

(www.powerint.com) that provided a link to a listing of Power Integrations' patents.

Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 4,881,075. On the basis of these facts, Power Integrations denies this request.

#### **REQUEST FOR ADMISSION NO. 6:**

Admit that prior to October 20, 2004, Power Integrations made, sold, or offered for sale within or imported into the United States products that practice or embody at least one claim of U.S. Patent No. 6,107,851

#### **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

Subject to and without waiving its General Objections, Power Integrations responds as follows: Admitted.

#### **REQUEST FOR ADMISSION NO. 7:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 6,107,851 on any product prior to October 20, 2004

#### **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

Power Integrations objects to the words "fix" and "on any product" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at <a href="https://www.powerint.com">www.powerint.com</a>.

At that same time, Power Integrations included a notice on its website

(www.powerint.com) that provided a link to a listing of Power Integrations' patents.

Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,107,851. On the basis of these facts, Power Integrations denies this request.

## **REQUEST FOR ADMISSION NO. 8:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 6,107,851 on any package prior to October 20, 2004.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

Power Integrations objects to the words "fix" and "on any package" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at www.powerint.com.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,107,851. On the basis of these facts, Power Integrations denies this request.

## **REQUEST FOR ADMISSION NO. 9:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 6,107,851 on any label prior to October 20, 2004.

## RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Power Integrations objects to the words "fix" and "on any label" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at <a href="https://www.powerint.com">www.powerint.com</a>.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,107,851. On the basis of these facts, Power Integrations denies this request.

## **REQUEST FOR ADMISSION NO. 10:**

Admit that Power Integrations did not mark any product with U.S. Patent No. 6,107,851 pursuant to 35 U.S.C. § 287(a) prior to October 20, 2004.

## RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Power Integrations objects to the words "mark any product" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at <a href="https://www.powerint.com">www.powerint.com</a>.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,107,851. On the basis of these facts, Power Integrations denies this request.

## **REQUEST FOR ADMISSION NO. 11:**

Admit that prior to October 20, 2004, Power Integrations made, sold, or offered for sale within or imported into the United States products that practice or embody at least one claim of U.S. Patent No. 6,249,876.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

Subject to and without waiving its General Objections, Power Integrations responds as follows: Admitted.

## **REQUEST FOR ADMISSION NO. 12:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 6,249,876 on any product prior to October 20, 2004.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

Power Integrations objects to the words "fix" and "on any product" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at www.powerint.com.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,249,876. On the basis of these facts, Power Integrations denies this request.

#### **REQUEST FOR ADMISSION NO. 13:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 6,249,876 on any package prior to October 20, 2004.

#### **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

Power Integrations objects to the words "fix" and "on any package" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at www.powerint.com.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,249,876. On the basis of these facts, Power Integrations denies this request.

#### **REQUEST FOR ADMISSION NO. 14:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 6,249,876 on any label prior to October 20, 2004.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

Power Integrations objects to the words "fix" and "on any label" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at <a href="https://www.powerint.com">www.powerint.com</a>.

At that same time, Power Integrations included a notice on its website

(www.powerint.com) that provided a link to a listing of Power Integrations' patents.

Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,249,876. On the basis of these facts, Power Integrations denies this request.

## **REQUEST FOR ADMISSION NO. 15:**

Admit that Power Integrations did not mark any product with U.S. Patent No. 6,249,876 pursuant to 35 U.S.C. § 287(a) prior to October 20, 2004.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

Power Integrations objects to the words "mark any product" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at <a href="https://www.powerint.com">www.powerint.com</a>.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,249,876. On the basis of these facts, Power Integrations denies this request.

## **REQUEST FOR ADMISSION NO. 16:**

Admit that prior to October 20, 2004, Power Integrations made, sold, or offered for sale within or imported into the United States products that practice or embody at least one claim of U.S. Patent No. 6,226,366.

#### **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

Subject to and without waiving its General Objections, Power Integrations responds as follows: Admitted.

## **REQUEST FOR ADMISSION NO. 17:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 6,226,366 on any product prior to October 20, 2004.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

Power Integrations objects to the words "fix" and "on any product" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at www.powerint.com.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,226,366. On the basis of these facts, Power Integrations denies this request.

#### **REQUEST FOR ADMISSION NO. 18:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 6,226,366 on any package prior to October 20, 2004.

#### **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

Power Integrations objects to the words "fix" and "on any package" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at www.powerint.com.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,226,366. On the basis of these facts, Power Integrations denies this request.

#### **REQUEST FOR ADMISSION NO. 19:**

Admit that Power Integrations did not fix the number of U.S. Patent No. 6,226,366 on any label prior to October 20, 2004

#### **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

Power Integrations objects to the words "fix" and "on any label" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at www.powerint.com.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,226,366. On the basis of these facts, Power Integrations denies this request.

#### **REQUEST FOR ADMISSION NO. 20:**

Admit that Power Integrations did not mark any product with U.S. Patent No. 6,226,366 pursuant to 35 U.S.C. § 287(a) prior to October 20, 2004.

#### RESPONSE TO REQUEST FOR ADMISSION NO. 20:

Power Integrations objects to the words "mark any product" as vague and ambiguous. Subject to its general and specific objections, Power Integrations responds as follows:

On or about July 3, 2002, Power Integrations began including the following information on its data sheets and catalogs:

The products and applications illustrated herein (include circuits external to the products and transformer construction) may be covered by one or more U.S. and foreign patents or potentially by pending U.S. and foreign patent applications assigned to Power Integrations. A complete list of Power Integrations' patents may be found at www.powerint.com.

At that same time, Power Integrations included a notice on its website (www.powerint.com) that provided a link to a listing of Power Integrations' patents. Currently, the website states the following:

Power Integrations currently holds 117 U.S. and 81 foreign patents as of December 31, 2004.

Click here to see a complete list of Power Integrations' U.S. patents. (Link will open a new window and take you to the U.S. Patent and Trademark Office Website.)

Clicking on the link at the Power Integrations' website does open a new window and display a current listing of Power Integrations' U.S. patents from the U.S. Patent and Trademark Office Website, including U.S. Patent No. 6,226,366. On the basis of these facts, Power Integrations denies this request.

#### **REQUEST FOR ADMISSION NO. 21:**

Admit that prior to October 20, 2004 Power Integrations did not provide actual notice pursuant to 35 U.S.C. § 287(a) to Fairchild of Power Integrations' contention that Fairchild infringed U.S. Patent No. 6,107,851.

## RESPONSE TO REQUEST FOR ADMISSION NO. 21:

Subject to and without waiving its General Objections, Power Integrations responds as follows: Admitted.

## **REQUEST FOR ADMISSION NO. 22:**

Admit that prior to October 20, 2004 Power Integrations did not provide actual notice pursuant to 35 U.S.C. § 287(a) to Fairchild of Power Integrations' contention that Fairchild infringed U.S. Patent No. 6,249,876.

## RESPONSE TO REQUEST FOR ADMISSION NO. 22:

Subject to and without waiving its General Objections, Power Integrations responds as follows: Admitted.

## **REQUEST FOR ADMISSION NO. 23:**

Admit that prior to October 20, 2004 Power Integrations did not provide actual notice pursuant to 35 U.S.C. § 287(a) to Fairchild of Power Integrations' contention that Fairchild infringed U.S. Patent No. 4,811,075.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

Subject to and without waiving its General Objections, Power Integrations responds as follows: Admitted.

## **REQUEST FOR ADMISSION NO. 24:**

Admit that prior to October 20, 2004 Power Integrations did not provide actual notice pursuant to 35 U.S.C. § 287(a) to Fairchild of Power Integrations' contention that Fairchild infringed U.S. Patent No. 6,226,366.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

Subject to and without waiving its General Objections, Power Integrations responds as follows: Admitted.

## **REQUEST FOR ADMISSION NO. 25:**

Admit that prior to October 20, 2004 Power Integrations did notify Fairchild of Fairchild's alleged infringement of the Power Integrations Patents.

#### **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

Subject to and without waiving its General Objections, Power Integrations responds as follows: Denied.

Dated: February 23, 2005

FISH & RICHARDSON P.C., P.A.

Bv:

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Attorneys for Power Integrations POWER INTEGRATIONS, INC.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of February, 2005, a true and correct copy of

## POWER INTEGRATIONS, INC.'S RESPONSES TO DEFENDANTS' FIRST SET OF REQUESTS FOR ADMISSION (NOS. 1-25)

was caused to be served on the attorneys of record at the following addresses as

indicated:

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Ashby & Geddes
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BY FEDERAL EXPRESS

BY HAND-DELIVERY

LisaMarie Hernandez

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## EXHIBIT B

# REDACTED

## **EXHIBIT C**

# REDACTED